REMARKS

I. INTRODUCTION

Claims 1, 20 and 34-38 have been amended. No new matter has been added. Claims 1, 4-20 and 22-38 remain pending in the present application. In view of the above amendments and the following remarks, it is respectfully submitted that all of the pending claims are allowable.

II. CLAIM REJECTIONS – 35 U.S.C. § 102(e)

Claims 1, 4-20 and 22-38 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2002/0052893 to Grobler et al. (hereinafter "Grobler"). (See 05/22/08 Office Action, p. 2).

Currently amended claim 20 recites, "[a] method of translating a file from a source format to a target format, the method comprising: (a) identifying a feature set of a source file at a first memory location; (b) ***upon identifying the feature set***, assembling the feature set in a buffer at a second memory location ***separate from the first memory location***; and (c) writing the feature set into a target file in the target format." (Emphasis added).

Grobler describes a computer-based method and system for importing a table data from a selected source document into a selected target document. (*See Grobler*, Abstract). Specifically, a user of the system may select a source and a target during the import process. (*See Id.*, ¶¶ [0060] – [0061]). The selections may be made using either a drag-and-drop function or by a copy-and-paste function of a clipboard provided by the system. (*See Id.*, ¶¶ [0019], [0062]). Upon selecting the source and target of the import process, the selected source data is temporarily stored within the system. (*See Id.*, ¶ [0063]). The table structure of the temporarily stored source data is analyzed by parsing the source data for tags in order to identify columns and rows contained in the source data, in addition to the contents of the columns and rows of the source data. (*See Id.*, ¶ [0064]). After the table structure of the source data is analyzed, the system determines whether the user has selected to specify the format of the target table, wherein the user may choose and modify the data contained in the source data. (*See Id.*, ¶¶ [0068] – [0069]). After processing the user settings, the system creates an empty target table having a table structure in accordance with the results of the user settings. (*See Id.*, ¶ [0070]). Finally, the empty table target is filled with the source data by inserting the contents of the columns and rows of the source data into the empty target table. (*See Id.*, ¶ [0072]).

The Examiner equates the "assembling the feature set in a buffer," in claim 20, to the temporary storage of the source data in Grobler. However, this is incorrect. Grobler states:

> [a]fter the source and target of the import process have been selected in operation 810, the source data selected in operation 810 is handed over to and temporarily stored in temporarily store source data operation 820. Next analyze source data structure operation 830 analyzes the table structure of the temporarily stored source data. Operation 830 parses the source data for tags, which indicate the table structure of the source data. (*See Grobler*, ¶¶ [0063]-[0064]).

Grobler takes the source data, and then stores it, in its entirety, in a temporary storage space. After the source data has been moved to the temporary storage space the source data is analyzed for tags. In contrast, claim 20 specifically recites, "(a) identifying a feature set of a source file at a first memory location; (b) ***upon identifying the feature set***, assembling the feature set in a buffer, the buffer at a second memory location *separate from the first memory location*." Accordingly, the identifying of the feature set in the source file is done prior to being stored in a buffer. Once the feature set has been identified, the feature set is then moved into a buffer. In Grobler, however, the source data is moved into temporary storage and then analyzed for tags. The Examiner acknowledges and agrees with this limitation of the Grobler disclosure. (*See 11/28/2008 Examiner's Answer*, p. 9, lines 16-20). Therefore, Applicant respectfully submits that Grobler does not teach or suggest the above recitation of claim 20. Thus, Applicant respectfully submits that claim 20 is patentable over Grobler. Because claims 22-33 depend from, and therefore include all the limitations of claim 20, it is respectfully submitted that these claims are also allowable for at least the same reasons given above with respect to claim 20.

Independent claim 34 recites, *inter alia*, "…(a) providing a feature identifier to determine a feature set of the source file at a first memory location; (b) upon the determining of the feature set by the feature identifier, providing a buffer to assemble the feature set, the buffer at a second memory location separate from the first memory location…" Applicant respectfully submits that this claim is also allowable for at least the same reasons stated above with respect to claim 20.

Independent claim 35 recites, *inter alia*, "…a feature identifier to determine a feature set of the source file at a first memory location; a buffer to assemble the feature set upon the determining of the feature set by the feature identifier, the buffer at a second memory location separate from the first memory location…" Applicant respectfully submits that this claim is also allowable for at least the same reasons stated above with respect to claim 20.

Independent claim 36 recites, *inter alia*, "…computer readable program code for identifying a feature set of the source file at a first memory location; computer readable program code for assembling the feature set in a buffer upon the identifying the feature set, the buffer at a second memory location separate from the first memory location…" Applicant respectfully submits that this claim is also allowable for at least the same reasons stated above with respect to claim 20.

Independent claim 37 recites, *inter alia*, "…computer readable program code for identifying a feature set of the source file at a first memory location; computer readable program code for assembling the feature set in a buffer upon the identifying the feature set, the buffer at a second memory location separate from the first memory location…" Applicant respectfully submits that this claim is also allowable for at least the same reasons stated above with respect to claim 20.

Independent claim 1 recites, *inter alia*, "...a feature identifier to determine a feature set of the source file at a first memory location; a buffer to assemble the feature set upon the determining of the feature set by the feature identifier, the buffer at a second memory location separate from the first memory location..." Applicant respectfully submits that this claim is also allowable for at least the same reasons stated above with respect to claim 20. Because claims 4-19 depend from, and therefore include all the limitations of claim 1, it is respectfully submitted that these claims are also allowable for at least the same reasons given above with respect to claim 1.

Independent claim 38 recites, *inter alia*, "...a feature identifier having a front-end lookup table to map MIF code fragments of the source file to a list of features to determine a feature set of the source file at a first memory location; a buffer to store and assemble the feature set upon determining the feature set by the feature identifier, the buffer at a second memory location separate from the first memory location..." Applicant respectfully submits that this claim is also allowable for at least the same reasons stated above with respect to claim 20.

CONCLUSION

It is therefore respectfully submitted that all of the presently pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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